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May 17, 2005

Filed Electronically

Ms. Marlene H. Dortch
Secretary of the Commission
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

RE: *Hearing Aid-Compatibility Report (WT Docket No. 01-309)*

Dear Ms. Dortch:

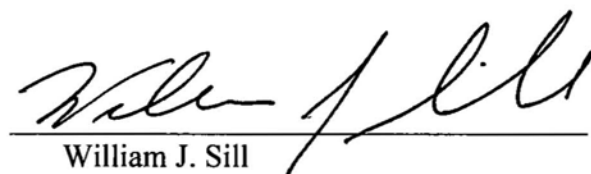
Pursuant to the Commission's *Hearing Aid-Compatibility Report and Order*,¹ attached please find a Hearing Aid-Compatibility status report submitted on behalf of Inland Cellular Telephone Company ("Inland"), the general partner of Eastern Sub-RSA Limited Partnership and Washington RSA No. 8 Limited Partnership.

Please do not hesitate to contact the undersigned with any questions that you may have at (202) 783-4141.

Sincerely,

WILKINSON BARKER KNAUER, LLP

By:


William J. Sill

Attachment

¹ Section 68.4(a) of the Commission's Rules Governing Hearing Aid-Compatible Telephones, WT Docket No. 01-309, *Report and Order*, 18 FCC Rcd 16753 (2003).

HEARING AID-COMPATIBILITY STATUS REPORT

May 17, 2005

**Eastern Sub-RSA Limited Partnership
Licensee of:**

**WA5 (B2) Washington 5 - Kittitas RSA
Call Sign: KNKQ283**

and

**Washington RSA No. 8 Limited Partnership
Licensee of:**

**WA8 (B) Washington 8 - Whitman RSA
Call Sign: KNKN489**

**ID1 (B2) Idaho 1 - Boundary RSA
Call Sign: KNKQ400**

**ID2 (B2) Idaho 2 - Idaho RSA
Call Sign: KNKR305**

Inland Cellular Telephone Company ("Inland"), the general partner of Eastern Sub – RSA Limited Partnership and Washington RSA No. 8 Limited Partnership (collectively "the Partnerships"), hereby provides the Commission with the Hearing Aid-Compatibility Status Report ("Report"), as required by the Commission's *Hearing Aid-Compatible Report and Order*.¹ Inland is submitting this report, on behalf of the Partnerships, in order to provide the Commission with the current status of the Partnerships' efforts and progress toward compliance with the Commission's hearing aid-compatibility requirements. In preparing the instant Report, Inland followed the guidelines the Commission set forth in its *Hearing Aid-Compatible Report and Order*.²

¹ Section 68.4(a) of the Commission's Rules Governing Hearing Aid-Compatible Telephones, WT Docket No. 01-309, *Report and Order*, 18 FCC Rcd 16753 (2003).

² *Id.* at ¶ 89.

Licensee Name and Contact Information:
Eastern Sub-RSA Limited Partnership
Washington RSA No. 8 Limited Partnership
c/o

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Licensee's Relationship to Equipment Manufacturers:

As stated in its November 17th Hearing Aid-Compatibility Status Report,³ the Partnerships, as small carriers, do not purchase a sufficient number of handsets to be allowed to buy directly from the handset manufacturers. Instead, the Partnerships must rely on 'middle-men' or third party vendors who purchase new handsets from manufacturers and then sell them to small carriers. The Partnerships regularly purchase handsets from the following third party vendors: Brightpoint, Cellstar, IDCOMM and Aerovoice. Currently, the Partnerships stock handset models from the following equipment manufacturers: Nokia, Kyocera, Motorola, LG and Audiovox.

The Partnerships' attenuated relationship with equipment manufacturers adversely impacts the Partnerships in several respects. First, it is difficult to obtain up-to-the-minute information concerning equipment manufacturers' planned offerings. Second, prior experience with E911 Phase II ALI equipped handsets has shown that this distant relationship results in the Partnerships receiving the newer more desirable handset models long after the larger CMRS carriers receive them.

Licensees Hearing Aid-Compatibility Efforts to Date:

Inland, on behalf of the Partnerships, has kept abreast, as best it can, with hearing aid-compatible handset offerings. As recently as this week Inland contacted several of the above mentioned third party vendors and equipment manufacturers and requested the latest information related to the status of manufacturers' plans to provide hearing aid-compatible handsets and the impact of the FCC's Public Notice concerning the acceptability of the ANSI C63.19 standard. As noted below, presently the Partnerships are able to provide new phone subscribers with a limited, but increasing number of hearing aid-compatible handsets. In addition, Inland continues to implement and refine its customer outreach efforts.

³ See Hearing Aid-Compatibility Status Report for Eastern Sub-RSA Limited Partnership and Washington RSA No. 8 Limited Partnership, filed November 17, 2004 ("November 17th Status Report").

Phone Models which Manufacturers State are Hearing Aid-Compatibility Compliant and ANSI C63.19 Rating:

Based on Inland's efforts to gather equipment information from its third party vendors and equipment manufacturers, Inland understands that all Kyocera and Motorola handsets offered by the Partnerships are hearing aid-compatibility compliant.⁴ Kyocera and Motorola handsets now account for thirty-five percent of the handsets sold by the Partnerships. Additionally, the Partnerships will be adding in the next week the Nokia 6255i handset to the models it offers. According to third party vendors and equipment manufacturers, this handset is also hearing aid-compatibility compliant.

Phone Models that Manufacturers State are Compatible with Hearing Aids:

As a result of its information gathering efforts, , Inland understands that along with the hearing aid-compatible Kyocera and Motorola offerings, Motorola offers integrated earpiece speakers ("dynamic speaker") that will couple with, and be compatible with, telecoil equipped hearing aids in all its current wireless handsets. In addition, Motorola offers a hands free loop-set accessory. The loop-set is a headset that plugs into a handset and is worn around the subscriber's neck. The loop-set wirelessly retransmits the audio signals through the loop-set back to the hearing aid.

Retail Availability of Compliant Phones:

Out of the twenty handset models the Partnerships presently offer,⁵ twelve handset models are, according to their manufacturers, hearing aid-compatibility compliant. In addition, the Partnerships continue to offer Motorola handsets that have dynamic speakers (Motorola V60s) which Motorola states renders it compatible with telecoil equipped hearing aids.

Total Number of Compliant Phones Offered:

The Partnerships calculate that approximately 35% of the handsets provided to new subscribers are the Kyocera and Motorola hearing aid-compatibility compliant handsets and the Motorola dynamic speaker equipped handsets. Additionally, the percentage of handsets provided to new subscribers should continue to increase with the addition of the Nokia 6255i handset.

Total Number of Non-Compliant Phones Offered:

The remaining eight handset models offered by the Partnerships are not hearing aid-compatibility compliant. The Partnerships are pleased to report that there are several different types of accessories that can be used to make non-compliant handsets more compatible with hearing aids. Based on its review of available literature, the Partnerships believe that many of

⁴ By 'hearing aid-compatibility compliant', Inland believes the manufacturers are stating that their models can be used with many different hearing aids without causing significant interference. Motorola has informed Inland that testing, utilizing the new ANSI C63.19 standard, has begun on models that Inland is planning to make available to customers. To date, both tested models were determined to be hearing aid-compatibility compliant. Further, Motorola has informed Inland that they plan to test additional models, and Motorola expects those models to be found to be hearing-aid compliant as well.

⁵ The Partnerships offer 20 handset models, however, older handset inventory is also retained for purchase by subscribers.

their other handset offerings would be compatible with loop-sets as well as with the Plantronic's hands-free headset.⁶ The Partnerships currently offer both these accessories to their subscribers. In addition, the Partnerships now offer the Hearing Aid Telephone Interconnect System ("HATIS") as an accessory for subscriber's with hearing aids.⁷

Information Regarding Differences in Handset Offerings Among Regions in Service Areas (For Service Providers Only):

The Partnerships are small carriers with four systems located in two adjacent states. Thus, while the Partnerships have not noticed any discrepancies in the handset offerings between the four systems, the Partnerships do not feel that the systems are sufficiently numerous or distant from one another such that a meaningful response can be provided to this question.

Efforts to Incorporate Hearing Aid-Compatibility into Newer Models:

As noted above, Inland understands that Motorola's and Kyocera's handsets are HAC compatible. In addition, Inland has been informed that certain manufacturers, such as Motorola, offer handsets with integrated dynamic speakers that will allow for coupling with hearing aid telecoils making the handsets compatible with these hearing aids.

Activities Related to ANSI C63.19 or other Standards of Work:

Inland and the Partnerships will continue to keep abreast of developments in hearing aid-compatible handsets through third party vendors, review of manufacturer's publicly available documents, consultation with its counsel, and interfacing with industry organizations of which Inland is a member.

Ongoing Efforts for Interoperability Testing with Hearing Aids:

Due to their status as small carriers, the Partnerships are reliant upon handset manufacturers and industry standards groups to work towards a standard for interoperability testing as well as to conduct such tests.

Product Labeling Information:

The Partnerships are able to provide their subscribers with new handsets through their retail cellular stores and through third party agents that sell their products.⁸ The Partnerships understand and will comply with the Commission's requirement that service providers ensure that information concerning hearing aid-compatible handsets, and more particularly a handset's U-Rating, is made visible to their subscribers.

⁶ Plantronic's hands-free headset, which is similar in function to a loop-set, appears to be compatible with telecoil-equipped hearing aids.

⁷ The HATIS is a small device that fits over the subscriber's ear next to the hearing aid and plugs directly into the audio jack of a wireless handset.

⁸ The Partnerships' agents generally sell Partnership provided handsets. One exception, however, is Tracfone, a pre-paid cellular reseller of the Partnership's services that acquires and sells its own handsets. Tracfone's handsets are branded as Tracfone handsets rather than as the Partnerships or Inlands' handsets. Thus, the Partnerships are not able to monitor nor control Tracfone's self-branded handsets.

Outreach Efforts

Since filing their November 17th Status Report with the Commission, the Partnerships continue to train their retail employees to identify and provide information regarding hearing aid-compatible handsets and accessories, such as the loop-set accessory, to the Partnerships' current and prospective subscribers. The Partnerships believe that one of the most effective ways to disseminate information to its consumers is at the point of sale. The Partnerships will continue to educate their retail staff on hearing aid-compatibility issues and the developing technology offered through the equipment manufacturers, so that their retail staff can continue to function as a source of reliable and current information.

The Partnerships intend to build on their efforts to educate both their potential subscribers and their current subscribers on the hearing aid-compatible handsets being offered:

- The Partnerships have begun to supply their retail staff with informational materials concerning the compliant handsets and accessories. In the future, the Partnerships will increase the amount of informational literature they make available at the Partnerships' retail stores concerning compliant handsets and accessories;
- Inland has updated its web site to make hearing aid-compatible related information available on Inland Cellular Telephone's web site, calling attention to the hearing aid-compatible handsets offered, their capabilities and other details regarding the compliant handsets. Inland intends to add information regarding the compatibility of the Kyocera and Motorola models by the end of May 2005; and
- Staff have been instructed to direct interested customers at point of sale stations to access Inland's HAC web pages via in-store computers. Additionally, signs are in the process of being added at each point of sale station with updated information about hearing aid-compatibility compliant handsets and accessories. The last of these signs should be installed by the end of May 2005.